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Attorneys for Defendant,  
FWREF Nashville Airport, LLC

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re:

URBAN COMMONS, LLC,

Debtor.

CAROLYN A. DYE, Chapter 7 Trustee,

Plaintiff,

vs.

FWREF NASHVILLE AIRPORT, LLC, a  
Delaware limited liability company,

Defendant.

Case No. 2:21-bk-13523-ER

Chapter 7

Adv. No.: 2:23-ap-01302-ER

**OBJECTION TO BANKRUPTCY COURT  
ENTERING A FINAL ORDER IN THIS  
ADVERSARY PROCEEDING**

***Current Status Conference Hearing:***

Date: August 22, 2023

Time: 10:00 a.m.

Location: Courtroom 1568  
255 E. Temple St.  
Los Angeles, CA 90012

Defendant FWREF Nashville Airport, LLC hereby interposes its objection to the entry of a final order by the United States Bankruptcy Court in the above captioned adversary proceeding. For the reasons that will be set forth in Defendant's response to Plaintiff's Complaint (which response is now due, pursuant to the parties' stipulation therefor, on or before August 25, 2023) and additional pleadings to be filed, including Defendant's right to a jury trial, this matter is most properly adjudicated by the United States District Court.

Dated: August 8, 2023

PACHULSKI STANG ZIEHL & JONES LLP

By

/s/ Andrew W. Caine

Andrew W. Caine

Jeffrey P. Nolan

Attorneys for Defendant

FWREF Nashville Airport, LLC

PACHULSKI STANG ZIEHL & JONES LLP  
ATTORNEYS AT LAW  
LOS ANGELES, CALIFORNIA

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **OBJECTION TO BANKRUPTCY COURT ENTERING A FINAL ORDER IN THIS ADVERSARY PROCEEDING** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 8, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Carolyn A Dye (TR)** trustee@cadye.com, c197@ecfcbis.com;atty@cadye.com
- **Jeffrey P Nolan** jnolan@pszjlaw.com
- **Leonard Pena** lpena@penalaw.com, penasomaecf@gmail.com;penalr72746@notify.bestcase.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (*date*) **August 8, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **August 8, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

### Via Federal Express

Hon. Ernest M. Robles  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1560/Courtroom 1568  
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 8, 2023  
Date

Rolanda Mori  
Printed Name

/s/ Rolanda Mori  
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

June 2012

**F 9013-3.1.PROOF.SERVICE**

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